

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

\_\_\_\_\_  
UNITED STATES OF AMERICA,

v.

EARL DICKERSON  
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) CRIMINAL NO. 04-10202-RWZ  
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**GOVERNMENT'S PROPOSED VOIR DIRE QUESTIONS**

The United States of America proposes the following voir dire questions to be posed to prospective jurors during jury selection:

1. The United States of America is one of the litigants in this trial. You will hear the United States referred to throughout the trial as "the government." Have you, or any member of your immediate family, or anyone with whom you are close:

(a) ever answered charges (other than for an alleged moving traffic violation) in a criminal proceeding?

(b) ever filed a lawsuit or claim of any kind against any police or other law enforcement officer?

(c) ever engaged in litigation with the federal government, that is, ever filed a claim or lawsuit against the United States or any of its agencies, or answered some claim made against you by the federal government?

2. Have you, a family member, or a close friend or business associate  
ever

had any involvement, of any sort, with the Boston Police Department? Have you had any experience with any law enforcement officer or agency that may influence in any way your consideration of this case?

3. Aside from these particular circumstances, are you aware of any prejudice which you may have against the government which would in any way impair your ability to evaluate

and judge fairly and impartially the facts of this case?

4. Some of the witnesses expected to be called by the United States at trial are officers of the Boston Police Department. These law enforcement officers will be called to testify. Are you aware of any prejudice that you might have against a witness or other individual in this case where that witness is a law enforcement officer?

5. Are you willing and able to completely and honestly apply the law, as I give it to you at the end of the case, to the facts as you find them? Do you know of any reason why you cannot sit as a fair and impartial juror in the trial of this case?

6. As a juror in this matter, you will be asked to listen to the evidence presented by the parties and the law as the Court provides it for you. You will then be asked to return a verdict. Do you have any personal convictions that would prevent you from returning a verdict of Guilty or Not Guilty against another person?

7. Do you have any hearing impairment that may affect your ability to listen to testimony of witnesses?

8. Do you have any difficulty in understanding English that may affect your ability to understand the testimony of witnesses?

9. The indictment alleges that the defendant, Earl Dickerson, committed a federal crime. Do any of you know Mr. Dickerson?

10. Do any of you know Mr. Dickerson's attorney, Elliot Weinstein, or the prosecutor,

John Capin?

11. I am going to read you a list of the witnesses that are expected to testify during this trial. If you know any of these witnesses, please raise your hand.

Respectfully submitted,

MICHAEL J. SULLIVAN  
United States Attorney

By: /s/ John A. Capin

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JOHN A. CAPIN  
Assistant U.S. Attorney